

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: THOMAS BENEDICT LAMPRON , aka	:	Chapter 13
Thomas B. Lampron, aka Thomas Lampron,	:	Case No. 5:17-bk-03429
Debtor.	:	

JPMORGAN CHASE BANK, N.A. ,	:	
Movant,	:	Motion for
v.	:	Relief from Stay
THOMAS BENEDICT LAMPRON and	:	
CHARLES J. DEHART, III , Trustee,	:	
Respondents.	:	

**ANSWER TO MOTION OF
JPMORGAN CHASE BANK FOR RELIEF FROM STAY**

AND NOW COMES Debtor **THOMAS BENEDICT LAMPRON**, by and through his attorneys, **NEWMAN, WILLIAMS, MISHKIN, CORVELEYN, WOLFE & FARERI, P.C.**, and in Answer to the Motion of **JPMORGAN CHASE BANK** for Relief from Stay avers:

1. Denied to the extent the averments of paragraph 1 are other than a statement or conclusion of law or request for relief that does not require a response.
- 2-7. Admitted.
8. Denied. Debtor reasonably believes the amount due is less.
9. Denied. The vehicle has low mileage, is garage kept, and is reasonably believed to have a value in excess of the amount alleged.
10. Denied to the extent the averments of paragraph 10 are other than a statement or conclusion of law or request for relief that does not require a response. Debtor posits that insurance on the vehicle issues by New Jersey Manufacturers Ins. Co. and payments to date and going forward constitute adequate protection.

11. Denied to the extent the averments of paragraph 11 are other than a statement or conclusion of law or request for relief that does not require a response. As the vehicle is necessary for transportation to and from medical appointments required by Debtor's medical conditions, including severe posttraumatic stress disorder related to Debtor's status as an army veteran of foreign wars, having served in Vietnam, it is necessary for an effective reorganization.

WHEREFORE, Debtor **THOMAS BENEDICT LAMPRON** respectfully prays this Honorable Court for an Order that the Motion of **JPMORGAN CHASE BANK** for Relief from Stay be Denied, or, in the alternative, an Order Conditioning the Automatic Stay on future monthly payments to cure any postpetition default, and for such other and further relief as the Honorable Court deems just and appropriate.

NEWMAN, WILLIAMS, MISHKIN,
CORVELEYN, WOLFE & FARERI, P.C.

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